

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JOHN T. SANDERS,

Plaintiff,

vs.

CUYAHOGA COUNTY, OHIO, et al.,

Defendants.

)  
) Case No.: 1:21cv1254

)  
) Judge Donald C. Nugent

) **MOTION FOR LEAVE TO PERMIT**  
) **PLAINTIFF TO FILE A**  
) **MEMORANDUM NOT TO EXCEED 30**  
) **PAGES IN OPPOSITION TO THE**  
) **PENDING MOTION TO DISMISS**  
)

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Now comes the Plaintiff, by and through counsel, and respectfully requests that he be granted leave to file a Memorandum not to exceed 30 pages in opposition to Defendants, Cuyahoga County, Armond Budish, and David Schilling's, Motion to Dismiss filed on or about 1-25-2022. Plaintiff currently is limited to 20 pages pursuant to Local Rule 7.1(f). However, for good cause shown, the Court may authorize the filing of a Memorandum opposing a dispositive motion exceeding the page limits. Plaintiff states that good cause exists for filing a Memorandum not to exceed 30 pages for the reasons stated herein and in the Memorandum in Support of this Motion.

Plaintiff respectfully states that the length of his Opposition Memorandum should be extended in order to permit him to adequately address the issues raised by the Defendants moving to dismiss his case against them. The moving Defendants have advanced ten (10) reasons for the dismissal of his Complaint. In support, these Defendants cite approximately 50 cases, and approximately six (6) statutory provisions. Plaintiff states that a 30 page

Memorandum is reasonable to respond given the number of issues raised and referenced supporting authority.

As good cause exists, Plaintiff respectfully requests this Court grant his Motion.

Respectfully submitted,

/s/ Subodh Chandra

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### **CERTIFICATION OF SERVICE**

This is to certify that a copy of the foregoing document was filed electronically on this 9th day of March, 2022. Notice of this filing will be sent to the parties by operation of the Court's electronic system. Parties may access the filing through the Court's system.

/s/ William H. Bartle

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